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Attorneys for Defendant Watch Tower Bible and Tract Society of Pennsylvania

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA BILLINGS DIVISION

TRACY CAEKAERT and CAMILLIA MAPLEY,

Plaintiffs.

-VS-

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA, and BRUCE MAPLEY SR.,

Defendants.

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., and WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA,

Cross-Claimants,

Case No. CV-20-00052-SPW-TJC

DEFENDANT WATCH
TOWER BIBLE AND TRACT
SOCIETY OF
PENNSYLVANIA'S
UNOPPOSED
MOTION TO VACATE AND
RESET HEARING

-VS-

BRUCE MAPLEY SR.,

Cross-Defendant.

Defendant Watch Tower Bible and Tract Society of Pennsylvania ("WTPA") respectfully requests that the hearing on Plaintiffs' Motion for Sanctions set for February 11, 2022, at 9:30 a.m., be vacated and reset for the reason that counsel for WTPA are in separate trials next week and will be unavailable. Counsel had waited to file this in the hopes that one or both trials would not occur and the hearing at issue could be held as scheduled, but counsel have concluded that both trials shall be proceeding next week and they will be unavailable for the hearing. Therefore, WTPA requests that the hearing be vacated and reset. Counsel apologizes for any inconvenience to the parties or the Court.

This motion is unopposed. A proposed order is attached hereto.

**DATED** this 1<sup>st</sup> day of February, 2022.

## MOULTON BELLINGHAM PC

By <u>/s/ Gerry P. Fagan</u>

GERRY P. FAGAN CHRISTOPHER T. SWEENEY JORDAN W. FITZGERALD P.O. Box 2559 Billings, Montana 59103-2559

Attorneys for Watch Tower Bible and Tract Society of Pennsylvania

## **CERTIFICATE OF SERVICE**

I hereby certify that on 1<sup>st</sup> day of February, 2022, a copy of the foregoing was served on the following persons:

1. U.S. District Court, Billings Division 2. Robert L. Stepans Ryan R. Shaffer James C. Murnion MEYER, SHAFFER & STEPANS, PLLP 430 Ryman Street Missoula, MT 59802 Attorneys for Plaintiffs Guy W. Rogers Joel M. Taylor, Esq. (pro hac vice) 3. MILLER MCNAMARA & TAYLOR LLP Jon A. Wilson Brett C. Jensen 100 South Bedford Road, Suite 340 BROWN LAW FIRM, P.C. Mount Kisco, NY 10549 315 North 24th Street P.O. Drawer 849 Billings, MT 59103-0849 Attorneys for Defendant Watchtower Bible and Tract Society of New York, Inc. Bruce G. Mapley, Sr. 4. 3905 Caylan Cove Birmingham, AL 35215 By the following means: 1, 2, 3 CM/ECF Fax Hand Delivery E-Mail U.S. Mail Overnight Delivery Services By /s/ Gerry P. Fagan

GERRY P. FAGAN